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**BELLSOUTH**

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

Ex Parte

November 6, 1996

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20554

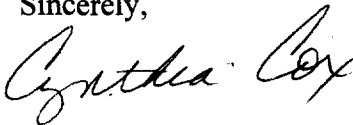
Re: CC Docket NO. 95-116, Local Number Portability

Dear Mr. Caton:

Today William Shaughnessy and the undersigned met with Chris Barnekov, Lloyd Collier, Neil Fried and Len Smith of the Competitive Pricing Division of the Common Carrier Bureau to discuss the attached material. Please include this material in the above referenced proceeding.

Two copies of the notice are filed in accordance with Commission rules. Please call me with any questions on this information.

Sincerely,



cc: C. Barnekov (w/o attachment)  
L. Collier (w/o attachment)  
N. Fried (w/o attachment)  
L. Smith (w/o attachment)

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## ***Local Number Portability***

**BellSouth Telecommunications, Inc.**

11/5/96

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# ***LNP--Discussion Points***

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## ***LNP Cost Recovery Constants***

- Costs borne by all telecommunication carriers
- Principle of Competitive Neutrality

# ***Competitive Neutrality***

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- Cost recovery mechanism should not impose a disproportionately greater burden on any one telecommunication carrier relative to another
- Cost recovery mechanism should not influence customer's decision to change service providers
- Cost recovery mechanism should ensure that all costs are broadly, fairly, and equitably distributed among all telecommunications service providers

# ***Costs Necessary for LNP***

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**Costs of installing & administering  
Regional NPAC / SMS Databases**

**(TYPE 1)**

**Plus**

**Direct Carrier- Specific Costs**

**(TYPE 2)**

***Equals***

**Total LNP Costs**

- *Implementation of LNP is an industry-wide effort*
- *All Type 1 & Type 2 costs must be incurred for LNP to be successful*
- *All telecommunications carriers will benefit from LNP*

# ***LNP Cost Recovery***

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- Total LNP costs (Type 1 & Type 2) must be allocated across all telecommunications carriers
- Allocation of Type 1 & Type 2 costs is not subsidization but a simple realization that all carriers benefit and that LNP cannot work without full participation of ILECs
- Timely resolution of cost recovery mechanism is imperative

# ***LNP Cost Recovery***

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- BellSouth Supports SBT's Cost Recovery Proposal for LNP:
  - Allocation of costs based on “elemental access lines”
    - Equitable distribution of costs across carriers;
    - Administratively simple;
  - Mandatory, temporary, uniform end user line charge